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April 22, 2014

Ms. Jill Sugarman
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

IDENTIFICATION NUMBER: C00431171

REFERENCE: YEAR-END REPORT (10/01/13 - 12/31/2013)

Dear Ms. Sugarman,

This statement is in response to the Commission's letter dated March 21, 2014. The Commission requested additional information on three items.

First, the Commission requested clarification on contributions that appear to exceed federal limits. The contributions from David Hicks and Randall Smith appear to be within federal limits. Those contributions involve donations from different people with similar names. The contributions from Hugh Glidewell are within federal limits. His \$5,000 contribution on 6/12/12 was charged back through his credit card on 8/13/12. See TRANS ID SA11.3784875. The rest of the individuals listed in the RFAI were mistakenly over the limit due to duplicate records. The records have been merged and the reallocation of these contributions has been requested by our Committee and will be reflected on the next distribution through the joint fundraising committee, Romney Victory, Inc. (C00518282). Any discrepancies in aggregates or cycle designations due to duplicates or data entry errors have been corrected on the subsequently filed amendment.

Second, the Commission requested clarification regarding contributions that appear to be from a corporation or labor organization. With respect to business entities, our Committee has safeguards in place to ensure that contributions are made by eligible donors only. Our Committee has verified that the contributions from the entities listed in the RFAI were made with permissible funds.

Third, the Commission requested clarification regarding contributions that appear to be from limited liability companies. With respect to LLCs, our Committee has safeguards in place to ensure that contributions are made by eligible donors only. Our Committee has verified that the contributions from the LLCs listed in the RFAI were made with permissible funds.

This should answer the Commission's inquiry.

Sincerely,

Darrell Crate
Treasurer
